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***Presentment Date: September 11, 2017***  
***Presentment Time: 12:00 p.m.***

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 7  
Case No. 16-70290 (ast)

Mark C. Healey,

Debtor.

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**NOTICE OF PRESENTMENT OF DEBTOR’S MOTION TO (I) REOPEN CHAPTER 7  
CASE PURSUANT TO §350 OF THE BANKRUPTCY CODE; AND (II) AVOID THE  
JUDGMENT LIENS OF ASSET ACCEPTANCE, LLC AND AMERICAN EXPRESS  
CENTURION BANK, PURSUANT TO §522(f) OF THE BANKRUPTCY CODE**

**PLEASE TAKE NOTICE** that upon the annexed motion (the “Motion”) of Mark C. Healey (the “Debtor”), by his attorneys, DelBello Donnellan Weingarten Wise & Wiederkehr, LLP, the Debtor will seek entry of an Order (i) reopening the Debtor’s Chapter 7 Case pursuant to §350 of the Bankruptcy Code; and (ii) avoiding the prepetition non-consensual judgment liens of Asset Acceptance LLC and American Express Centurion Bank, pursuant to §522(f) of the Bankruptcy Code with respect to the Debtor’s interest in his residence located at 15 Spencer Avenue, Lynbrook, New York 11563, together with such other and further relief as is just under the circumstances, and the Order will be presented to the Honorable Alan S. Trust, United States Bankruptcy Judge, at the United States Bankruptcy Court, Eastern District of New York, Alfonse M. D’Amato Federal Courthouse, 290 Federal Plaza, Room 960, Central Islip, New York 11722 on the 11<sup>th</sup> day of September, 2017 at 12:00 p.m.

**PLEASE TAKE FURTHER NOTICE**, that a copy of the Application is available for inspection at the office of the Clerk of the United States Bankruptcy Court during normal

business hours at the United States Bankruptcy Court, Alfonse M. D' Amato U.S. Courthouse, 290 Federal Plaza, Central Islip, New York 11722 or may be obtained by contacting the undersigned.

**PLEASE TAKE FURTHER NOTICE**, that Objections to the relief requested in the Motion, if any, must be in writing, conform with the Bankruptcy Code and Rules, state with particularity the grounds therefor, and be filed with the Court with a courtesy copy to the Chambers of the Honorable Alan S. Trust, and served upon the Plaintiff's co-counsel and the Office of the United States Trustee so as to be received at least 7 days prior to the presentment date hereof as follows: (a)(i) through the Bankruptcy Court's electronic filing system (in accordance with Order No. 476), which may be accessed through the Internet at the Bankruptcy Court's website: [www.nyeb.uscourts.gov](http://www.nyeb.uscourts.gov), and (ii) in portable document format (PDF) using Adobe Exchange Software for conversion; or (b) if a party is unable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number of the document to which the objection refers, and the file name on the outside of the envelope.

**Please be advised that if an objection is timely filed to the relief requested, or if the Court determines that a hearing is appropriate, the Court will schedule a hearing. Notice of such a hearing will be provided by the applicant.**

Dated: August 24, 2017  
White Plains, New York

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By: /s/ Dawn Kirby  
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